

Gage, Hannah

From: Gilliam, Allen
Sent: Wednesday, July 27, 2016 12:18 PM
To: 'Wages Jeff'
Cc: Cummins Jon; Arnold Anthony; Gage, Hannah; Leamons, Bryan; rthomas@waypointanalytical.com; mkauffman@waypointanalytical.com; 'helenawater@sbcglobal.net'
Subject: AR0043389_United Initiators ARP001013 early August 2016 semi annual Pretreatment report_20160727
Attachments: CFR 414 semi annual report 1606 CWF&DF signed.pdf; Wastewater Composite SOP 1607.pdf; Certification Statement 1606.pdf; United Initiators SPI Inc 16-145-0280 20160601 report_far_4025446-377.pdf; United Initiators SPI Inc 16-165-0230 20160620 report_far_4051211-380.pdf

Jeff,

United Initiator's August 2016 semi-annual report was received early, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(e) and more specifically in compliance with the Organic Chemical, Plastics and Synthetic Fibers standards found in 40 CFR 414.111.

It appears Waypoint's use of allowable alternate method 624 removed the need for dilution showing only three regulated parameters having to be diluted 5 X to reach an MQL using method 625 (correct me if I'm wrong on this terminology Randy or Michael). The attached analyticals are the best seen for compliance purposes. Please continue this practice.

Thank you for your timely report.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

cc: Terry McGinister, City of Helena General Manager
Randy Thomas/Michael Kauffman, Waypoint Analytical

E/NPDES/NPDES/Pretreatment/Reports

From: Wages Jeff [<mailto:Jeff.Wages@united-in.com>]
Sent: Tuesday, July 26, 2016 8:41 AM
To: Gilliam, Allen
Cc: Cummins Jon; Arnold Anthony
Subject: United Initiators Wastewater Report August 2016

Dear Mr. Gilliam,

In accordance with 40 CFR Part 403.12(e) industrial users with processes regulated by categorical pretreatment standards (40 CFR Part 414, et al), please find attached our most recent monitoring report for the wastewater discharged from the United Initiators, Inc. facility in Helena, Arkansas. Also attached are two sets of wastewater analytical results and some supplemental information.

Please contact me by phone at 870.572.2935 ext. 307 or by e-mail at jeff.wages@united-in.com if you have any questions or require additional information regarding this report.

Best Regards,

Jeff Wages

Regulatory Manager

Phone : +1 (870) 572-3297 Ext. 307

Fax: +1 (870) 572-1416

Mobile: +1 (870) 995-3443

jeff.wages@united-in.com

UNITED INITIATORS, INC

334 Phillips 311 Road

Helena, AR 72342

www.united-initiators.com

SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40 CFR 414

Return to: Water Div/NPDES Pretreatment

(1) IDENTIFYING INFORMATION	
<p>A. LEGAL NAME & MAILING ADDRESS</p> <p style="text-align: center;">United Initiators, Inc. 334 Phillips 311 Road Helena, AR 72342-9033</p>	<p>B. FACILITY & LOCATION ADDRESS</p> <p style="text-align: center;">United Initiators, Inc. 334 Phillips 311 Road Helena, AR 72342-9033</p>
<p>C. FACILITY CONTACT: Jeff Wages e-mail address <u>jeff.wages@united-in.com</u></p>	
(2) REPORTING PERIOD	
<p>A. MONTHS WHICH REPORTS ARE DUE</p> <p style="text-align: center;"><u>February</u> & <u>August</u></p>	<p>B. PERIOD COVERED BY THIS REPORT</p> <p>FROM: February 2016 TO: Augustt 2016</p>
(3) DESCRIPTION OF OPERATION	
<p>A. REGULATED PROCESSES</p> <p><u>CORE PROCESS(ES)</u></p> <p>Specify Category and Sub-Categor(ies)</p> <p>Check each applicable Subpart</p> <ul style="list-style-type: none"> 9 Subpart A--General 9 Subpart B--Rayon Fibers 9 Subpart C--Other Fibers 9 Subpart D--Thermoplastic Resins 9 Subpart E--Thermosetting Resins 9 Subpart F--Commodity Organic Chemicals 9 Subpart G--Bulk Organic Chemicals <input checked="" type="checkbox"/> : Subpart H--Specialty Organic Chemicals 	<p>B. CHANGES: SUMMARIZE ANY CHANGES IN THE REGULATED PROCESSES SINCE THE LAST REPORT. ATTACH AN ADDITIONAL SHEET IF THE SPACE BELOW IS INADEQUATE. PROVIDE A NEW SCHEMATIC IF APPROPRIATE.</p> <p>C. Number of Regular Employees at this Facility <u>49</u></p>
(4) FLOW MEASUREMENT	
<p>A. Total Plant Flow to POTW in Gallons per Day</p> <p>Average: <u>53,130</u> gpd Maximum: <u>63,237</u> gpd</p>	

40CFR414 SEMI-ANNUAL REPORT CON'D FACILITY NAME:

(4) FLOW MEASUREMENT (CON'D)				
B. INDIVIDUAL PROCESS FLOWS IN GALLONS PER DAY				
Process	Average Flow Rate (gpd)	Maximum Flow Rate (gpd)	Type of Discharge (Batch, etc)	
Regulated	52,311	62,262	Batch & continuous	
Unregulated*				
Cooling Water				
**Sanitary	820	975		
**"Unregulated" has a precise legal meaning; see 40CFR403.6(e).				

(5) MEASUREMENT OF POLLUTANTS	
A. TYPE OF TREATMENT SYSTEM CHECK EACH APPLICABLE BLOCK G Neutralization G Chemical Precipitation and Sedimentation <input checked="" type="checkbox"/> Biological G Cyanide Destruction G Other _____ G None	B. COMMENTS Two aerated ponds with a total surface area of ~6.5 acres. ** Sanitary plus dilution from rain water equals ~0.92.
C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS ON THE EFFLUENT FROM ALL REGULATED PROCESSES--CORE & ANCILLARY--(AFTER TREATMENT, IF APPLICABLE). ATTACH THE LAB ANALYSIS WHICH SHOWS A MAXIMUM; TABULATE ALL THE ANALYTICAL DATA COLLECTED DURING THE REPORT PERIOD. ZERO CONCENTRATIONS ARE NOT ACCEPTABLE; LIST THE DETECTION LIMIT IF CONCENTRATION WAS BELOW DETECTION LIMIT.	

CFR 414	PSES and PSNS Limits (ug/l)		Measured Max for any 1 day (ug/l)	Measured Max for any <u>monthly</u> avg (ug/l)
	**Max for any 1 day	**Max for any monthly avg		
Effluent characteristics				
Acenaphthene	37	15	<2.00	<2.00
Anthracene	37	15	<2.00	<2.00
Benzene	106	45	1.77	1.77
Bis(2-ethylhexyl) phthalate	204	75	<10.0	<10.0
Carbon Tetrachloride	300	112	<1.00	<1.00
Chlorobenzene	300	112	1.32	1.32
Chloroethane	233	87	<1.00	<1.00
Chloroform	257	88	<1.00	<1.00
Di-n-butyl phthalate	34	16	<5.00	<5.00
1,2-Dichlorobenzene	627	155	2.59	2.59
1,3-Dichlorobenzene	300	112	<1.00	<1.00
1,4-Dichlorobenzene	300	112	<1.00	<1.00
1,1-Dichloroethane	47	17	<1.00	<1.00
1,2-Dichloroethane	453	142	<1.00	<1.00

40CFR414 SEMI-ANNUAL REPORT CON'D FACILITY NAME:

1,1-Dichloroethylene	47	17	<1.00	<1.00
1,2-trans-Dichloroethylene	52	20	<1.00	<1.00
1,2-Dichloropropane	627	155	<1.00	<1.00
1,3-Dichloropropylene	627	155	<1.00	<1.00
Diethyl phthalate	89	36	<5.00	<5.00
Dimethyl phthalate	37	15	<5.00	<5.00
4,6-Dinitro-o-cresol	219	62	<500	<500
Ethylbenzene	300	112	<1.00	<1.00
Fluoranthene	43	17	<2.00	<2.00
Fluorene	37	15	<2.00	<2.00
Hexachlorobenzene	627	155	<5.00	<5.00
Hexachlorobutadiene	300	112	<5.00	<5.00
Hexachloroethane	627	155	<5.00	<5.00
Methyl Chloride	233	87	<1.00	<1.00
Methylene Chloride	134	28	<10.0	<10.0
Naphthalene	37	15	<2.00	<2.00
Nitrobenzene	5,056	1,767	<5.00	<5.00
2-Nitrophenol	182	51	<250	<250
4-Nitrophenol	455	128	<1000	<1000
Phenanthrene	37	15	<2.00	<2.00
Pyrene	38	16	<2.00	<2.00
Tetrachloroethylene	130	41	<1.00	<1.00
Toluene	58	22	6.04	6.04
Total Cyanide	948	332	7.00	7.00
Total Lead	57.6	57.6	<50.0	<50.0
Total Zinc ²	134.4	134.4	<500.0	<500.0
1,2,4-Trichlorobenzene	627	155	<5.00	<5.00
1,1,1-Trichloroethane	47	17	<1.00	<1.00
1,1,2-Trichloroethane	100	25	<1.00	<1.00
Trichloroethylene	54	21	<1.00	<1.00
Vinyl Chloride	136	77	<1.00	<1.00

40CFR414 SEMI-ANNUAL REPORT CON'D FACILITY NAME:

(7) GENERAL COMMENTS

See attached procedure used for sampling and compositing waste water samples taken from the three United Initiators, Inc. processes to be analyzed for lead and zinc. ETC Report Number 16-165-0230 analysis results correspond to the waste water sample taken utilizing this procedure.

(8) SIGNATORY REQUIREMENTS

I certify under penalty of law that I have personally examined and am familiar with the information in this semi-annual compliance report and all attachments, and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the report, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



Jon Cummins

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

SIGNATURE

Vice President of Operations

OFFICIAL TITLE

July 25, 2016

DATE SIGNED

Procedure for determining percent of each process for composite sample to be analyzed for lead and zinc

The amount/percent of waste water from each of the three United Initiators' process water samples to be contributed to the composite sample of all three processes was determined by dividing the average daily discharge of each process by the total average daily discharge of the entire facility.

August 2016 Report				
Composite sample by percent of process wastewater for zinc and lead analysis				
Process	BPO	MEKP	MIBKP	Total
Average GPD	32,747	19,407	157	52311
% of Total	0.626	0.371	0.003	

Compositing Procedure

Three sample containers are used to collect 500 milliliters of waste water from each of the three United Initiators' processes. One container is used for each separate process. Each container is labeled with the process name from which it was taken, i.e., BPO, MIBKP, and MEKP.

The three waste water samples are taken to the R&D Lab. 313 milliliters of the BPO process waste water sample are placed into the composite sample container. 185.5 milliliters of the MEKP process waste water sample is placed into the composite sample container. 1.5 milliliters of the MIBKP waste water sample is placed into the composite sample container. The composite sample container is sealed and shipped to United Initiators' analytical service provider for analysis.

334 Phillips 311 Road
Industrial Park Road
Helena, Arkansas 72342-9033

Customer Service: (800) 786-6722
Customer Service Fax: (800) 987-0845
Phone: (870) 572-2935
Fax: (870) 572-1416

7/25/2016

Allen Gilliam
ADEQ State Pretreatment Coordinator
Water Division
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

Dear Mr. Gilliam:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Jon Cummins
Vice President of Operations

6/1/2016

Rineco Analytical Services
Ms. Mia Dixon
P O Box 729
Benton, AR, 72018

Ref: Analytical Testing
Lab Report Number: 16-145-0280
Client Project Description: United Initiators, SPI, Inc.
Semi-annual Sampling

Dear Ms. Mia Dixon:

Waypoint Analytical, Inc. received sample(s) on 5/24/2016 for the analyses presented in the following report.

The above referenced project has been analyzed per your instructions. The analyses were performed in accordance with the applicable analytical method.

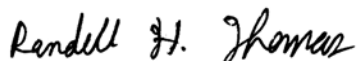
The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, method validations, instrumentation maintenance and calibration for all parameters (NELAP and non-NELAP) were performed in accordance with guidelines established by the USEPA (including 40 CFR 136 Method Update Rule May 2012) and NELAC unless otherwise indicated. Any parameter for which the laboratory is not officially NELAP accredited is indicated by a '~' symbol. These are not included in the scope because NELAP accreditation is either not available or has not been applied for. Additional certifications may be held/are available for parameters, where NELAP accreditation is not required or applicable. A full list of certifications is available upon request.

Certain parameters (chlorine, pH, dissolved oxygen, sulfite...) are required to be analyzed within 15 minutes of sampling. Usually, but not always, any field parameter analyzed at the laboratory is outside of this holding time. Refer to sample analysis time for confirmation of holding time compliance.

The results are shown on the attached Report of Analysis(s). Results for solid matrices are reported on an as-received basis unless otherwise indicated. This report shall not be reproduced except in full and relates only to the samples included in this report.

Please do not hesitate to contact me or client services if you have any questions or need additional information.

Sincerely,



Randy Thomas
Project Manager

Laboratory's liability in any claim relating to analyses performed shall be limited to, at laboratory's option, repeating the analysis in question at laboratory's expense, or the refund of the charges paid for performance of said analysis.

Alabama #40750	Louisiana #04015	VA NELAP #460181	Texas #T104704180-11-6	Arkansas #88-0650
Mississippi	California #2904	NC #415	Oklahoma #9311	Virginia #00106
Kentucky #90047	Tennessee #TN02027	EPA #TN00012	Kentucky UST #41	Kansas #E-10396



Client: Rineco Analytical Services
Project: United Initiators, SPI, Inc.
Lab Report Number: 16-145-0280
Date: 6/1/2016

CASE NARRATIVE

Semivolatile Organic Compounds - GC/MS Method EPA-625

Sample 96946 (Composite 5/23-24/16)

QC Batch No: L288500

Surrogates were flagged for recoveries in the associated project sample. During the extraction step, the extraction technician noted that a significant emulsion formed. Batch QC samples (Method Blank and Laboratory Control Samples) all showed surrogate recoveries within QC limits, indicating that the low recoveries were due to the sample matrix.

Sample 97001 (Composite 5/23-24/16)

QC Batch No: L288500

Surrogates were flagged for recoveries in the associated project sample. During the extraction step, the extraction technician noted that a significant emulsion formed. Batch QC samples (Method Blank and Laboratory Control Samples) all showed surrogate recoveries within QC limits, indicating that the low recoveries were due to the sample matrix.

QC Batch No: L288500

Sample requires dilution due to high levels of target and/or non-target analytes.

05424

Rineco Analytical Services
Ms. Mia Dixon
P O Box 729
Benton , AR 72018

Project United Initiators, SPI, Inc.
Information : Semi-annual Sampling

Report Date : 06/01/2016
Received : 5/24/2016

Report Number : **16-145-0280**

REPORT OF ANALYSIS

Lab No : **96945**
Sample ID : **Grab**

Matrix: **Aqueous**
Sampled: **5/24/2016 11:05**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Cyanide, Total	7.00	µg/L	5.00	1	05/25/16 12:13	EWB	4500CNE-2011

**Qualifiers/
Definitions**

* Outside QC limit
MQL Method Quantitation Limit

DF Dilution Factor

05424

Rineco Analytical Services
Ms. Mia Dixon
P O Box 729
Benton , AR 72018

Project United Initiators, SPI, Inc.
Information : Semi-annual Sampling

Report Date : 06/01/2016
Received : 5/24/2016

Report Number : **16-145-0280**

REPORT OF ANALYSIS

Lab No : **96945**

Matrix: **Aqueous**

Sample ID : **Grab**

Sampled: **5/24/2016 11:05**

Analytical Method: 624 **Prep Batch(es):** **L288370** 05/25/16 08:20

Prep Method: EPA-624 (PREP)

Test	Results	Units	ML	DF	Date / Time Analyzed	By	Analytical Batch
Benzene	1.77	µg/L	1.00	1	05/25/16 13:48	LAT	L288387
Carbon Tetrachloride	<1.00	µg/L	1.00	1	05/25/16 13:48	LAT	L288387
Chlorobenzene	1.32	µg/L	1.00	1	05/25/16 13:48	LAT	L288387
Chloroethane	<1.00	µg/L	1.00	1	05/25/16 13:48	LAT	L288387
Chloroform	<1.00	µg/L	1.00	1	05/25/16 13:48	LAT	L288387
Methyl Chloride	<1.00	µg/L	1.00	1	05/25/16 13:48	LAT	L288387
1,2-Dichlorobenzene	2.59	µg/L	1.00	1	05/25/16 13:48	LAT	L288387
1,3-Dichlorobenzene	<1.00	µg/L	1.00	1	05/25/16 13:48	LAT	L288387
1,4-Dichlorobenzene	<1.00	µg/L	1.00	1	05/25/16 13:48	LAT	L288387
1,1-Dichloroethane	<1.00	µg/L	1.00	1	05/25/16 13:48	LAT	L288387
1,2-Dichloroethane	<1.00	µg/L	1.00	1	05/25/16 13:48	LAT	L288387
1,1-Dichloroethylene	<1.00	µg/L	1.00	1	05/25/16 13:48	LAT	L288387
1,2-trans-Dichloroethylene	<1.00	µg/L	1.00	1	05/25/16 13:48	LAT	L288387
1,2-Dichloropropane	<1.00	µg/L	1.00	1	05/25/16 13:48	LAT	L288387
cis-1,3-Dichloropropene	<1.00	µg/L	1.00	1	05/25/16 13:48	LAT	L288387
trans-1,3-Dichloropropene	<1.00	µg/L	1.00	1	05/25/16 13:48	LAT	L288387
1,3-Dichloropropylene	<1.00	µg/L	1.00	1	05/25/16 13:48	LAT	L288387
Ethylbenzene	<1.00	µg/L	1.00	1	05/25/16 13:48	LAT	L288387
Methylene Chloride	<10.0	µg/L	10.0	1	05/25/16 13:48	LAT	L288387
Tetrachloroethylene	<1.00	µg/L	1.00	1	05/25/16 13:48	LAT	L288387
Toluene	6.04	µg/L	5.00	1	05/25/16 13:48	LAT	L288387
1,1,1-Trichloroethane	<1.00	µg/L	1.00	1	05/25/16 13:48	LAT	L288387

Qualifiers/ * Outside QC limit
Definitions MQL Method Quantitation Limit

DF Dilution Factor

05424

Rineco Analytical Services
Ms. Mia Dixon
P O Box 729
Benton , AR 72018

Project United Initiators, SPI, Inc.
Information : Semi-annual Sampling

Report Date : 06/01/2016
Received : 5/24/2016

Report Number : **16-145-0280**

REPORT OF ANALYSIS

Lab No : **96945**

Matrix: **Aqueous**

Sample ID : **Grab**

Sampled: **5/24/2016 11:05**

Analytical Method: 624 **Prep Batch(es):** **L288370** 05/25/16 08:20

Prep Method: EPA-624 (PREP)

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
1,1,2-Trichloroethane	<1.00	µg/L	1.00	1	05/25/16 13:48	LAT	L288387
Trichloroethylene	<1.00	µg/L	1.00	1	05/25/16 13:48	LAT	L288387
Vinyl Chloride	<1.00	µg/L	1.00	1	05/25/16 13:48	LAT	L288387
Surrogate: 4-Bromofluorobenzene	113		Limits: 71-131%	1	05/25/16 13:48	LAT	L288387
Surrogate: Dibromofluoromethane	75.6		Limits: 70-128%	1	05/25/16 13:48	LAT	L288387
Surrogate: 1,2-Dichloroethane - d4	75.6		Limits: 67-136%	1	05/25/16 13:48	LAT	L288387
Surrogate: Toluene-d8	87.6		Limits: 70-130%	1	05/25/16 13:48	LAT	L288387

**Qualifiers/
Definitions**

* Outside QC limit
MQL Method Quantitation Limit

DF Dilution Factor

05424

Rineco Analytical Services
Ms. Mia Dixon
P O Box 729
Benton , AR 72018

Project United Initiators, SPI, Inc.
Information : Semi-annual Sampling

Report Date : 06/01/2016
Received : 5/24/2016

Report Number : **16-145-0280**

REPORT OF ANALYSIS

Lab No : **96946**

Matrix: **Aqueous**

Sample ID : **Composite 5/23-24/16**

Sampled: **5/24/2016 0:00**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Total Lead	<5.00	µg/L	5.00	10	05/26/16 16:18	CGC	EPA-200.8
Total Zinc	90.6	µg/L	50.0	10	05/26/16 16:18	CGC	EPA-200.8

**Qualifiers/
Definitions**

* Outside QC limit
MQL Method Quantitation Limit

DF Dilution Factor

05424

Rineco Analytical Services
Ms. Mia Dixon
P O Box 729
Benton , AR 72018

Project United Initiators, SPI, Inc.
Information : Semi-annual Sampling

Report Date : 06/01/2016
Received : 5/24/2016

Report Number : **16-145-0280**

REPORT OF ANALYSIS

Lab No : **96946**

Matrix: **Aqueous**

Sample ID : **Composite 5/23-24/16**

Sampled: **5/24/2016 0:00**

Analytical Method: 625

Prep Batch(es): **L288497** 05/26/16 13:00

Prep Method: 625

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
Acenaphthene	<2.00	µg/L	2.00	1	05/31/16 16:18	RQE	L288500
Anthracene	<2.00	µg/L	2.00	1	05/31/16 16:18	RQE	L288500
Bis(2-ethylhexyl)phthalate	<10.0	µg/L	10.0	1	05/31/16 16:18	RQE	L288500
1,2-Dichlorobenzene	<5.00	µg/L	5.00	1	05/31/16 16:18	RQE	L288500
1,3-Dichlorobenzene	<5.00	µg/L	5.00	1	05/31/16 16:18	RQE	L288500
1,4-Dichlorobenzene	<5.00	µg/L	5.00	1	05/31/16 16:18	RQE	L288500
Diethyl phthalate	<5.00	µg/L	5.00	1	05/31/16 16:18	RQE	L288500
Dimethyl phthalate	<5.00	µg/L	5.00	1	05/31/16 16:18	RQE	L288500
Di-n-butyl phthalate	<5.00	µg/L	5.00	1	05/31/16 16:18	RQE	L288500
Fluoranthene	<2.00	µg/L	2.00	1	05/31/16 16:18	RQE	L288500
Fluorene	<2.00	µg/L	2.00	1	05/31/16 16:18	RQE	L288500
Hexachlorobenzene	<5.00	µg/L	5.00	1	05/31/16 16:18	RQE	L288500
Hexachlorobutadiene	<5.00	µg/L	5.00	1	05/31/16 16:18	RQE	L288500
Hexachloroethane	<5.00	µg/L	5.00	1	05/31/16 16:18	RQE	L288500
Naphthalene	<2.00	µg/L	2.00	1	05/31/16 16:18	RQE	L288500
Nitrobenzene	<5.00	µg/L	5.00	1	05/31/16 16:18	RQE	L288500
Phenanthrene	<2.00	µg/L	2.00	1	05/31/16 16:18	RQE	L288500
Pyrene	<2.00	µg/L	2.00	1	05/31/16 16:18	RQE	L288500
1,2,4-Trichlorobenzene	<5.00	µg/L	5.00	1	05/31/16 16:18	RQE	L288500
Surrogate: 2-Fluorobiphenyl	19.0 *		Limits: 38-107%	1	05/31/16 16:18	RQE	L288500
Surrogate: Nitrobenzene-d5	16.5 *		Limits: 29-105%	1	05/31/16 16:18	RQE	L288500
Surrogate: 4-Terphenyl-d14	33.5		Limits: 30-130%	1	05/31/16 16:18	RQE	L288500

**Qualifiers/
Definitions**

* Outside QC limit
MQL Method Quantitation Limit
DF Dilution Factor

05424

Rineco Analytical Services
Ms. Mia Dixon
P O Box 729
Benton , AR 72018

Project United Initiators, SPI, Inc.
Information : Semi-annual Sampling

Report Date : 06/01/2016
Received : 5/24/2016

Report Number : **16-145-0280**

REPORT OF ANALYSIS

Lab No : **97001**

Matrix: **Aqueous**

Sample ID : **Composite 5/23-24/16**

Sampled: **5/24/2016 0:00**

Analytical Method: 625 **Prep Batch(es):** **L288497** 05/26/16 13:00

Prep Method: 625

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
4,6-Dinitro-o-cresol	<500	µg/L	500	5	06/01/16 00:47	RQE	L288500
2-Nitrophenol	<250	µg/L	250	5	06/01/16 00:47	RQE	L288500
4-Nitrophenol	<1000	µg/L	1000	5	06/01/16 00:47	RQE	L288500
Surrogate: 2-Fluorophenol	5.66 *		Limits: 8-88%	5	06/01/16 00:47	RQE	L288500
Surrogate: Phenol-d6	6.56 *		Limits: 7-58%	5	06/01/16 00:47	RQE	L288500
Surrogate: 2,4,6-Tribromophenol	64.6		Limits: 16-138%	5	06/01/16 00:47	RQE	L288500

**Qualifiers/
Definitions**

* Outside QC limit
DF Dilution Factor
MQL Method Quantitation Limit

Cooler Receipt Form

Customer Number: **05424**

Customer Name: **Rineco Analytical Services**

Report Number: **16-145-0280**

Shipping Method

Fed Ex US Postal Lab Other :
 UPS Client Courier Thermometer ID: #9

Shipping container/cooler uncompromised? Yes No

Number of coolers received

Custody seals intact on shipping container/cooler? Yes No Not Required

Custody seals intact on sample bottles? Yes No Not Required

Chain of Custody (COC) present? Yes No

COC agrees with sample label(s)? Yes No

COC properly completed Yes No

Samples in proper containers? Yes No

Sample containers intact? Yes No

Sufficient sample volume for indicated test(s)? Yes No

All samples received within holding time? Yes No

Cooler temperature in compliance? Yes No

Cooler/Samples arrived at the laboratory on ice. Samples were considered acceptable as cooling process had begun. Yes No

Water - Sample containers properly preserved Yes No N/A

Water - VOA vials free of headspace Yes No N/A

Trip Blanks received with VOAs Yes No N/A

Soil VOA method 5035 – compliance criteria met Yes No N/A

High concentration container (48 hr) Low concentration EnCore samplers (48 hr)

High concentration pre-weighed (methanol -14 d) Low conc pre-weighed vials (Sod Bis -14 d)

Special precautions or instructions included? Yes No

Comments:

Any regulatory non-compliance issues will be recorded on non-compliance report.

Signature:

Date & Time:



16-145-0280
05424
05-24-2016
13:44:57
Rineco Analytical Services
United Initiators, SPI, Inc.

CHAIN-OF-CUSTO

Kit ID: 0000050195
Initiated By: Randy Thomas
Project Comment

Company Name Rineco Analytical Services	Company Number 05424	Client Project Manager/Contact Rineco Analytical Services	Purchase Order Number
Site Name United Initiators, SPI, Inc.	Project Number	<input type="checkbox"/> RUSH - Additional charges apply <input type="checkbox"/> Special Detection Limits(s) Date Results Needed	Method of Shipment <input type="checkbox"/> Fed Ex <input type="checkbox"/> UPS <input type="checkbox"/> USPS <input type="checkbox"/> Courier <input type="checkbox"/> Client Drop Off Other
LIMS Project ID Rineco - Semi-annual	Project Manager Phone # (501) 778-9089	Project Manager Email	Site/Facility ID #

Date	Time	Sample ID	Matrix	Grab/Comp	# of Cont	Container Type	Preservation	Analyses
5-24-16	1105	Grab	Aqueous	G	3	Glass Vial Amber - 40ml	HCL - Hydrochloric Acid	VOC
↓	↓	Grab	Aqueous	G	1	Plastic - Pint	NaOH - Sodium Hydroxide	CNT
23 5-24-16	—	Composite	Aqueous	C	1	Plastic - Pint	HNO3 - Nitric Acid	Pb/Zn
↓	↓	Composite	Aqueous	C	2	Glass Amber - Liter	Na2S2O3 - Sodium Thiosulfate	SVOC

For Laboratory Use Only			Sampled by (Name - Print)	Client Remarks/Comments				
Ice Y/N	Custody Seals Y/N	Lab Comments	<i>John D. Qualls</i>					
			Relinquished by: (SIGNATURE)	Date	Time	Received by: (SIGNATURE)	Date	Time
			Relinquished by: (SIGNATURE)	Date	Time	Received by: (SIGNATURE)	Date	Time
Blank/Cooler Temp T9 0.9°C			Relinquished by: (SIGNATURE)	Date	Time	Received by: (SIGNATURE)	Date	Time
			<i>John D. Qualls</i>	5-24-16	1235	<i>John D. Qualls</i>	5-24-16	1235

6/20/2016

Rineco Analytical Services
Ms. Mia Dixon
P O Box 729
Benton, AR, 72018

Ref: Analytical Testing
Lab Report Number: 16-165-0230
Client Project Description: United Initiators, SPI, Inc.

Dear Ms. Mia Dixon:
Waypoint Analytical, Inc. received sample(s) on 6/13/2016 for the analyses presented in the following report.

The above referenced project has been analyzed per your instructions. The analyses were performed in accordance with the applicable analytical method.

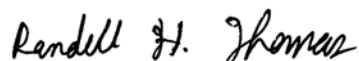
The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, method validations, instrumentation maintenance and calibration for all parameters (NELAP and non-NELAP) were performed in accordance with guidelines established by the USEPA (including 40 CFR 136 Method Update Rule May 2012) and NELAC unless otherwise indicated. Any parameter for which the laboratory is not officially NELAP accredited is indicated by a '~' symbol. These are not included in the scope because NELAP accreditation is either not available or has not been applied for. Additional certifications may be held/are available for parameters, where NELAP accreditation is not required or applicable. A full list of certifications is available upon request.

Certain parameters (chlorine, pH, dissolved oxygen, sulfite...) are required to be analyzed within 15 minutes of sampling. Usually, but not always, any field parameter analyzed at the laboratory is outside of this holding time. Refer to sample analysis time for confirmation of holding time compliance.

The results are shown on the attached Report of Analysis(s). Results for solid matrices are reported on an as-received basis unless otherwise indicated. This report shall not be reproduced except in full and relates only to the samples included in this report.

Please do not hesitate to contact me or client services if you have any questions or need additional information.

Sincerely,



Randy Thomas
Project Manager

Laboratory's liability in any claim relating to analyses performed shall be limited to, at laboratory's option, repeating the analysis in question at laboratory's expense, or the refund of the charges paid for performance of said analysis.

Alabama #40750	Louisiana #04015	VA NELAP #460181	Texas #T104704180-11-6	Arkansas #88-0650
Mississippi	California #2904	NC #415	Oklahoma #9311	Virginia #00106
Kentucky #90047	Tennessee #TN02027	EPA #TN00012	Kentucky UST #41	Kansas #E-10396



Client: Rineco Analytical Services
Project: United Initiators, SPI, Inc.
Lab Report Number: 16-165-0230
Date: 6/20/2016

CASE NARRATIVE

Metals Analyses Method EPA-200.8

Sample 91826 (Effluent)

Sample required an initial dilution due to the sample matrix.

05424

Rineco Analytical Services
Ms. Mia Dixon
P O Box 729
Benton , AR 72018

Project United Initiators, SPI, Inc.
Information :

Report Date : 6/20/2016

Report Number : **16-165-0230**

REPORT OF ANALYSIS

Received : 6/13/2016

Lab No : **91826**
Sample ID : **Effluent**

Matrix: **Aqueous**
Sampled: **6/9/2016 9:50**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Total Lead	<50.0	µg/L	50.0	100	06/17/16 16:40	CGC	EPA-200.8
Total Zinc	<500	µg/L	500	100	06/17/16 16:40	CGC	EPA-200.8

**Qualifiers/
Definitions**

DF

Dilution Factor

MQL

Method Quantitation Limit

Cooler Receipt Form

Customer Number: **05424**
 Customer Name: **Rineco Analytical Services**
 Report Number: **16-165-0230**

Shipping Method

Fed Ex US Postal Lab Other :
 UPS Client Courier Thermometer ID:

Shipping container/cooler uncompromised?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Number of coolers received	<input type="text" value="1"/>		
Custody seals intact on shipping container/cooler?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Not Required
Custody seals intact on sample bottles?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Not Required
Chain of Custody (COC) present?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
COC agrees with sample label(s)?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
COC properly completed	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Samples in proper containers?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Sample containers intact?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Sufficient sample volume for indicated test(s)?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
All samples received within holding time?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Cooler temperature in compliance?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Cooler/Samples arrived at the laboratory on ice. Samples were considered acceptable as cooling process had begun.	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Water - Sample containers properly preserved	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
Water - VOA vials free of headspace	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> N/A
Trip Blanks received with VOAs	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> N/A
Soil VOA method 5035 – compliance criteria met	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> N/A
<input type="checkbox"/> High concentration container (48 hr)		<input type="checkbox"/> Low concentration EnCore samplers (48 hr)	
<input type="checkbox"/> High concentration pre-weighed (methanol -14 d)		<input type="checkbox"/> Low conc pre-weighed vials (Sod Bis -14 d)	
Special precautions or instructions included?	<input type="radio"/> Yes	<input checked="" type="radio"/> No	

Comments:

Any regulatory non-compliance issues will be recorded on non-compliance report.

Signature: Date & Time:



16-165-0230
05424
06-13-2016
08:36:58

Rineco Analytical Services
United Initiators, SPI, Inc.

CHAIN-OF-CUSTO

Kit ID: 0000066037
Initiated By: Randy Thomas
Project Comment

Company Name Rineco Analytical Services		Company Number 05424		Client Project Manager/Contact United Initiators Attn: Jeff Wages		Purchase Order Number		
Site Name United Initiators, SPI, Inc.		Project Number		<input type="checkbox"/> RUSH - Additional charges apply <input type="checkbox"/> Special Detection Limits(s) Date Results Needed		Method of Shipment <input type="checkbox"/> Fed Ex <input type="checkbox"/> UPS <input type="checkbox"/> USPS <input type="checkbox"/> Courier <input type="checkbox"/> Client Drop Off Other		
LIMS Project ID		Project Manager Phone # (501) 778-9089		Project Manager Email		Site/Facility ID #		
Date	Time	Sample ID	Matrix	Grab/Comp	# of Cont	Container Type	Preservation	Analyses
6/9/16	0950	Effluent	Aqueous		1	Plastic - Pint	HNO3 - Nitric Acid	Pb/Zn

For Laboratory Use Only			Sampled by (Name - Print)		Client Remarks/Comments			
Ice	Custody Seals	Lab Comments <i>FAD by</i>	<i>Jeff Wages</i>					
<i>Y/N</i>	<i>Y/N</i>		Relinquished by: (SIGNATURE)	Date Time	Received by: (SIGNATURE)	Date Time		
			<i>Jeff Wages</i>	<i>6/9/16 1005</i>				
Blank/Cooler Temp			Relinquished by: (SIGNATURE)	Date Time	Received by: (SIGNATURE)	Date Time		
<i>NR</i>					<i>R Thomas</i>	<i>6/9/16</i>		

0650